

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

SVV TECHNOLOGY INNOVATIONS, INC.,

Plaintiff,

v.

ASUSTeK COMPUTER INC.,

Defendant.

Civil Action No. 6:22-cv-00311-ADA

JURY DEMANDED

**DEFENDANT ASUSTeK COMPUTER INC.'S NOTICE OF DISCLOSURE OF
PRIOR ART PURSUANT TO 35 U.S.C. § 282**

Defendant ASUSTeK Computer Inc. (“ASUSTeK” or “Defendant”) hereby provides its notice of disclosure pursuant to 35 U.S.C. § 282 to Plaintiff SVV Technology Innovations, Inc. (“SVV” or “Plaintiff”) of prior art materials with respect to the asserted United States Patent Nos. 8,290,318 (the “’318 Patent”); 9,880,342 (the “’342 Patent”); 10,439,089 (the “’089 Patent”); and 10,627,562 (the “’562 Patent”) (collectively, the “Asserted Patents”).

In addition to the items expressly disclosed in this Notice, Defendant also incorporates by reference the potential trial exhibits, the expert reports submitted in this matter, all information set forth in the file histories for the Asserted Patents or otherwise disclosed in pleadings and discovery in this case, including Defendant’s invalidity contentions, discovery responses and supplemental responses, and in correspondence.

Further, Defendant disclose persons who may be called upon to provide testimony regarding prior art at trial. Defendant reserves the right to supplement this statement as appropriate.

I. PATENTS AND PATENT APPLICATIONS

Country	Patents / Patent Applications	Filing Date	Issue Date / Publication Date	Patentees / Named Inventors
USA	U.S. Patent No. 5,005,108	Feb. 10, 1989	Apr. 2, 1991	David J. Pristash Jeffery R. Parker
USA	U.S. Patent No. 5,897,184	Jul. 2, 1996	Apr. 27, 1999	Jesse B. Eichenlaub Russell W. Gruhlke
USA	U.S. Patent No. 6,139,162	Mar. 16, 1998	Oct. 31, 2000	Tadahiro Masaki
USA	U.S. Patent No. 6,247,826	Jul. 6, 1998	Jun. 19, 2001	Tatsuaki Funamoto Osamu Yokoyama
USA	U.S. Patent No. 7,046,905	Jul. 11, 2000	May 16, 2006	Mark E. Gardiner Sanford Cobb Wade D. Kretman
USA	U.S. Patent No. 7,131,764	Jun. 1, 2005	Nov. 7, 2006	Chien-Hung Hsu Wen-Yung Huang Ming-Dah Liu Bor-Jyh Pan
USA	U.S. Patent No. 7,246,933	Mar. 9, 2005	Jun. 24, 2007	Toru Kunimochi
USA	U.S. Patent No. 7,481,562	Nov. 18, 2004	Jan. 27, 2009	Janet Bee Yin Chua Kok Chin Pan Kee Yean Ng Kheng Leng Tan Tajul Arosh Baroky
USA	U.S. Patent No. 7,518,799	May 10, 2007	Apr. 14, 2009	Ju-hwa Ha Jung-wook Paek Jin-sung Choi Byung-yun Joo Jin-soo Kim Min-young Song
USA	U.S. Patent No. 7,663,713	Nov. 28, 2005	Feb. 16, 2010	Ken Saito Shigeo Shimano Hiroshi Nakamoto Hiroyuki Yoshida Hirokazu Yabe Toshitsugu Miyawaki Akiyoshi Tobe
USA	U.S. Patent No. 7,667,786	Jun. 16, 2006	Feb. 23, 2010	Masanori Nouchi Fumitoshi Matsuda Hiromitsu Hashiba
USA	U.S. Patent No. 7,695,150	Apr. 6, 2006	Apr. 13, 2010	Norihiro Dejima Makoto Kurihara Tomoki Fukuda

Country	Patents / Patent Applications	Filing Date	Issue Date / Publication Date	Patentees / Named Inventors
USA	U.S. Patent No. 7,876,489	Sep. 26, 2006	Jan. 25, 2011	Jignesh Gandhi Nesbitt W. Hagood Roger W. Barton
USA	U.S. Patent No. 7,918,597	Oct. 16, 2008	Apr. 5, 2011	Toru Kunimochi
USA	U.S. Patent No. 8,011,819	Dec. 31, 2008	Sep. 6, 2011	Guo-Han Yue
USA	U.S. Patent No. 8,070,346	Sep. 7, 2007	Dec. 6, 2011	Satoshi Maeda Hirokazu Aritake
USA	U.S. Patent No. 8,343,575	Dec. 30, 2008	Jan. 1, 2013	Robert S. Dubrow
USA	U.S. Patent No. 8,718,437	Sep. 12, 2008	May 6, 2014	Seth Coe-Sullivan John R. Linton Craig Breen Jonathan S. Steckel Mark Comerford Rohit Modi
USA	U.S. Patent App. Pub. No. 2006/0109682	Dec. 30, 2004	May 25, 2006	Youngwook Ko Namheon Lee Youngju Ahn
USA	U.S. Patent App. Pub. No. 2007/0002583	Dec. 22, 2005	Jan. 4, 2007	Man Hoan Lee Ji Su Yoon Sung Keun Lee
USA	U.S. Patent App. Pub. No. 2007/0069978	Sep. 28, 2006	Mar. 29, 2007	Yasuhiro Daiku
USA	U.S. Patent App. Pub. No. 2007/0279727	Sep. 26, 2006	Dec. 6, 2007	Jignesh Gandhi Nesbitt W. Hagood Roger W. Barton
USA	U.S. Patent App. Pub. No. 2008/0158912	May 2, 2007	Jul. 3, 2008	Yem-Yeu Chang Wen-Hsun Yang
USA	U.S. Patent App. Pub. No. 2008/0213508	Jan. 24, 2008	Sep. 4, 2008	Megumu Nagasawa Michie Sakamoto Akira Ootani
USA	U.S. Patent App. Pub. No. 2008/0230112	Mar. 25, 2008	Sep. 25, 2008	Keith W. Barnham Ian M. Ballard Massimo Mazzer
USA	U.S. Patent App. Pub. No. 2008/0271776	May 1, 2008	Nov. 6, 2008	John Paul Morgan
USA	U.S. Patent App. Pub. No. 2009/0091681	Oct. 2, 2008	Apr. 9, 2009	Shigeki Nishizawa Tsutomu Sato Yuuji Oomori
USA	U.S. Patent App. Pub. No. 2010/0283072	Jan. 15, 2010	Nov. 11 2010	Peter T. Kazlas
USA	U.S. Patent App. Pub. No. 2010/0033989	July 28, 2009	Feb. 11, 2010	Tun-Chien Teng Jyh-Ming Chen

Country	Patents / Patent Applications	Filing Date	Issue Date / Publication Date	Patentees / Named Inventors
USA	U.S. Patent App. Pub. No. 2010/0288352	May 11, 2010	Nov. 18, 2010	Jin Ji Lawrence Kaufman
USA	U.S. Patent App. Pub. No. 2011/0308611	Mar. 21, 2011	Dec. 22, 2011	John Paul Morgan
USA	U.S. Provisional Application No. 60/915,207	May 1, 2007		John Paul Morgan
USA	U.S. Provisional Application No. 60/951,775	July 25, 2007		John Paul Morgan
USA	U.S. Provisional Application No. 60/946,382	Jun. 26, 2007		Seth Coe-Sullivan
USA	U.S. Provisional Application No. 60/971,885	Sep. 12, 2007		Seth Coe-Sullivan
Int'l	International Publication Number WO 2009/031728	Nov. 26, 2007	Mar. 12, 2009	Seong Hoon Lee Man Suk Kim O Yong Jeong
Japan	Japanese Patent Application Publication No. 2006/114239	Apr. 27, 2006		Mitsuru Kamikatano Kuniharu Himeno Yoshishiro Terada
Japan	Japanese Patent Application Publication No. JP 2008/198376	Feb. 8, 2007	Aug. 28, 20	Yukito Nakamura
Japan	Japanese Patent Application Publication No. 2009/277464	May 14, 2008	Nov. 26, 2009	Koyama
Japan	Japanese Patent Application Publication No. 2009/301805	June 11, 2008	Dec. 24, 2009	Takeshi Ishida
Korea	Korean Patent Application Publication No. KR100933213	May 13, 2009	Dec. 22, 2009	Gwang-Seon Yoo

II. PRINTED PUBLICATIONS

Author / Date / Title / Pages
Kelly, M. (2008). <i>3M Outlook Meeting: Innovative Solutions for Light Management and Visual Communications</i> [PowerPoint slides]. http://media.corporate-ir.net/media_files/irol/80/80574/mikekellypresentationfinal.pdf . All pages.
Abileah, A. (2008). LCD Backlight Methodology and Applications Using Optical Enhancement Films. <i>Information Display</i> . All Pages.
Beyer, W. H. (1987). <i>CRC Standard Mathematical Tables</i> . (28th ed.). CRC Press, Inc. All Pages.
Petersen, J. K. (2003). <i>Fiber Optics Illustrated Dictionary</i> . CRC Press LLC. All Pages.
Bäumer, S. (Ed.). (2005). <i>Handbook of Plastic Optics</i> . Wiley-VCH Verlag GmbH & Co. KGaA. All pages.
Kobayashi, S., Mikoshiba, S., & Lim, S. (Eds.). (2009). <i>LCD Backlights</i> . John Wiley & Sons, Ltd. All pages.
Murray, C.B., Norris, D.J., & Bawensi, M.G. (1993). Synthesis and Characterization of Nearly Monodisperse CdE (E = S, Se, Te) Semiconductor Nanocrystallites. <i>Journal of the American Chemical Society</i> . 115(19). 8706-8715. All pages.
Hecht, E. (1987). <i>Optics</i> . (2nd ed.). Addison-Wesley Publishing Company. All pages.
Karp & Ford. (2009). “Planar micro-optic solar concentration using multiple imaging lenses into a common slab waveguide” (“Karp”). All pages.
<i>The Future of Display is Brighter and Bolder</i> . (2023). Nanosys. http://www.nanosys.com . All pages.
<i>Welcome to QD Vision</i> . (2005). QD Vision Inc. https://web.archive.org/web/20080102143128/http://qdvision.com:80/ . All pages.

III. PERSONS HAVING KNOWLEDGE OF PRIOR ART

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IV. **OTHER DISCLOSURES**

In addition to the disclosures above, Defendant also incorporates by reference the following documents as if set forth fully herein:

- The Asserted Patents and related patents, including their file histories, and any prior art cited during their prosecution.
- Each set of Defendant's invalidity contentions and the references cited therein.
- All prior art patents, publications, or products cited in the expert reports and declarations of the parties' experts, including the materials considered therein.
- The provisional, application, file history, and issued patents associated with any prior art identified above or cited in the expert reports and declarations of the parties' experts.
- All prior art references including documents, patents, publications, and products used as exhibits in all depositions taken in this matter, or in any other case in which Plaintiff has asserted the Asserted Patents.
- All prior art references including patents, publications, and products disclosed in the declarations and deposition transcripts of third-party witnesses in this case or any other case in which Plaintiff has asserted the Asserted Patents.
- Each set of invalidity contentions served on Plaintiff by any other company against whom Plaintiff has asserted the Asserted Patents, and the references cited therein.
- All prior art patents, publications, or products cited in the invalidity expert reports in any other case in which Plaintiff has asserted the Asserted Patents, including the materials considered therein.

DATED: May 16, 2024

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a) on May 16, 2024, and was served via CM/ECF on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(b)(1).

/s/ Jack Shaw
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